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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

SONOS, INC.,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

CASE NO. 3:20-cv-06754-WHA
Related to CASE NO. 3:21-cv-07559-WHA

CHART A TO GOOGLE LLC'S REVISED OMNIBUS ADMINISTRATIVE MOTION TO FILE UNDER SEAL PURSUANT TO THE COURT'S ORDER RE NEW MOTIONS TO SEAL (DKT. 846)

CHART A: Zone Scenes-Related Technical Information

Dkt.	Document	Portions to be Sealed	Narrowing from Original Request to Seal	Narrowing from Revised Request to Seal	Basis for Sealing[1]
440-15	Exhibit 6 to Moss Declaration	Portions outlined in green boxes	Removed descriptions of the operation of Google's products with respect to grouping functionality, discussions of "no standalone mode" non-infringing alternative for zone scene patents, implementation progress of redesign, the data generated when Google's products receive a request to create a speaker group and the operation of the product when transmitting a "join_group" command, quotations from internal technical spec documents regarding multizone grouping, references to messages sent when creating a group.	Further removed request to seal source code file paths and reference to and description of "prefs file."	Pages 13, 16, 17, 27, 31, 37-41: Contains highly confidential flows of source code function calls and source code hierarchy information that Google does not publicly reveal, which discloses Google's source code functionality because the identified functions and source code structures include their descriptive names indicating what each function and structure may intend to accomplish in the source code, including for the following functionalities: (1) Google Home app functionality related to the user interface display and user interactions regarding speaker group (page 13); (2) Google Home app functionality related to join_group() commands and speaker group formation (pages 16 and 17); (3) Google Home app functionality related to Cast target identification (pages 27 and 31); (4) source code related to playback (pages 37-41). In addition, these flows also reveal the hierarchy of Google's source code, how it is organized, how error checking is implemented, how much

[1] All pincites refer to internal document page numbers and exhibits.

					space Google devotes to each function and activity in the code, and Google's general process for source code organization and hierarchy. Page 15: Contains source code flows showing how Google intended to write and implement source code for the join_group() function, including from internal technical documents showing the proposed source code flow for adding a target device to a multizone group which discloses the type of data structure Google intended to use in the source code to store information related to the join_group command and details about the leader election process that were not described at trial. Although the general types of information that were included in a join_group command were discussed at trial, the source code implementation of the same was not disclosed and remains Google's confidential and competitively sensitive information. Disclosure of any of this information would competitively disadvantage Google by giving competitors Google's proprietary source code information that they could use to gain an advantage when developing the same or similar products because, generally, properly

					structured and efficient source code is superior to source code that is not, both for maintenance and in operation. Further, revealing Google's proprietary source code information would pose an increased security risk to Google by exposing the workings and flows of Google source code such that hostile parties may be able to learn how to exploit portions of the source code, potentially resulting in privacy issues for consumers, unauthorized use of copyrighted or proprietary content, among other issues.
528-4	Exhibit L to Google's MSJ	Portions outlined in green boxes	Removed request to seal discussion of source code paths and operation for the grouping functionality when receiving join_group command, discussion of source code paths and operation for grouping functionality when receiving join_group command after redesign was implemented, changes to certain source code functions as a result of the implementation of the redesign, and references to	Further removed request to seal source code regarding grouping redesign and discussion of certain functions for firmware on Google's speaker products.	Page 33: Contains source code trace showing how join_group messages are handled in Google's system, including identification of how Google has engineered handling the join_group message in its source code, the hierarchy of member functions, where each call to those member functions is made, and how those member functions are organized according to Google's confidential source code practices. This information was not disclosed at trial and is highly confidential and proprietary information. . Although not source code itself, the information sought to be sealed reveals

			the StopCurrentApp() function.		important information about Google's source code including: (1) which function calls are made in which classes and member functions, (2) through the descriptive naming of Google's member functions and classes, the underlying source code functionality of the same, and (3) Google's general processes for structuring its source code. Public disclosure of this information would divulge Google's highly confidential and proprietary source code architecture and functionality, which could be used by competitors to gain a competitive advantage that Google has in the marketplace because, generally, properly structured and efficient source code is superior to source code that is not, both for maintenance and in operation. Further, revealing Google's proprietary source code information would pose an increased security risk to Google by exposing the workings and flows of Google source code such that hostile parties may be able to learn how to exploit portions of the source code, potentially resulting in privacy issues for consumers, unauthorized use of copyrighted or proprietary content, among other issues. Google has narrowly tailored its sealing requests to avoid requesting to seal the

					RefreshDeviceGroups() source code that was discussed at trial; however, the *parent* source code functions are not necessary for the understanding of the RefreshDeviceGroups() source code described or disclosed at trial.
546-6	Revised Sealed Dkt. 252-2 (Google's Opposition to Sonos's MSJ)	Portion outlined in green box on page 10	Removed request to seal references to the join_group message, contents of the join_group message, operation of speaker after receiving a join_group command, testimony of Google's engineer regarding storage of group membership on speaker devices, and portion of presentation regarding Google's proposal for operation of grouping and casting functionalities in Cast for Audio product.	None	Page 10: Contains source code flow for adding a target device to a multizone group, which shows the type of data structure Google intended to use in the source code to store information related to the join_group command and further includes details about the leader election process that were not described at trial. Although the general types of information that were included in a join_group command were discussed at trial, the source code implementation of the same was not disclosed and remains Google's confidential and competitively sensitive information.
692-2	Exhibit 3	Portions outlined in green boxes	Removed request to seal references to "prefs file."	Further removed request to seal general discussion of source code regarding functional capability to display previously created groups and source code file paths.	Page 235: Contains portions of the source code functionality and source code flow for how Google's Home app for Android handles the display of speaker groups. Although not source code itself, the information sought to be sealed reveals important information about Google's source code including: (1) which function calls are made in

					which classes and member functions, (2) through the descriptive naming of Google's member functions and classes, the underlying source code functionality of the same, and (3) Google's general processes for structuring its source code. The public disclosure of this information would divulge Google's highly confidential and proprietary source code architecture and functionality, which could be used by competitors to gain a competitive advantage that Google has in the marketplace because, generally, properly structured and efficient source code is superior to source code that is not, both for maintenance and in operation. Further, revealing Google's proprietary source code information would pose an increased security risk to Google by exposing the workings and flows of Google source code such that hostile parties may be able to learn how to exploit portions of the source code, potentially resulting in privacy issues for consumers, unauthorized use of copyrighted or proprietary content, among other issues. Google has narrowly tailored its sealing request and is not seeking to seal, for example, mere identification of file names and file paths.